

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JOSE MIGUEL CARDONA ALONZO
DEBTOR(S)

CASE NUMBER: 18-06028/MCF

CHAPTER 13

**DEBTOR'S MOTION CONCERNING AMENDMENT
TO SCHEDULE "D" OFFICIAL FORM 106D**

TO THE HONORABLE COURT:

COMES NOW, JOSE MIGUEL CARDONA ALONZO, the Debtor through the undersigned attorney, and very respectfully states and prays as follows:

1. The Debtor is hereby submitting ***Amended Schedule "D" Official Form 106D*** dated October 15, 2020, herewith and attached to this motion.
2. This amendment to Schedule "D" is filed to **include a secured claim, from creditor Palmas del Mar Homeowners Association Inc., Civil Case No. HU2020CV00394, PO Box 9027, Humacao PR 00791; Gonzalez & Morales Law Offices LLC., Jose Rafael Gonzalez Rivera, Esq., PO Box 10242, Humacao PR 00792, balance owed \$3,070.09.**

WHEREFORE, the Debtor prays that this Honorable Court take knowledge of said amendment and provide accordingly.

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Debtors' Motion Concerning Amendment to Schedule "D"
Case no. 18-06028/MCF13

NOTICE

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFICATE OF SERVICE: I hereby certify that on this date I electronically filed the above document with the Clerk of the Court using the CM/ECF System which sends notification of such filing to all those who in this case have registered for receipt of notice by electronic mail, including the US Trustee's Office and the Trustee. I further certify that the foregoing has been served by depositing true and correct copies thereof in the United States Mail, postage prepaid, to none CM/ECF participants: Debtor to his address of record; to the creditor affected by the amendment: Palmas del Mar Homeowners Association, Inc., PO Box 9027, Humacao PR 00791; Gonzalez & Morales Law Offices, LLC, Jose Rafael Gonzalez Rivera, PO Box 10242, Humacao, PR 00792; and creditors and parties in interest as per the attached master address list.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 15th day of October 2020.

/s/Roberto Figueroa Carrasquillo
R FIGUEROA CARRASQUILLO LAW OFFICE PSC
USDC #203614
ATTORNEY FOR PETITIONER
PO BOX 186 CAGUAS PR 00726
TEL. NO. (787) 744-7699 FAX (787) 746-5294
EMAIL: rfc@rfigueroalaw.com

Fill in this information to identify your case:			
Debtor 1	JOSE MIGUEL CARDONA ALONZO		
	First Name	Middle Name	Last Name
Debtor 2 (Spouse if, filing)	First Name	Middle Name	Last Name
United States Bankruptcy Court for the: DISTRICT OF PUERTO RICO, SAN JUAN DIVISION			
Case number (if known)	3:18-bk-6028		

Check if this is an amended filing

Official Form 106D

Schedule D: Creditors Who Have Claims Secured by Property

12/15

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, copy the Additional Page, fill it out, number the entries, and attach it to this form. On the top of any additional pages, write your name and case number (if known).

1. Do any creditors have claims secured by your property?

No. Check this box and submit this form to the court with your other schedules. You have nothing else to report on this form.

Yes. Fill in all of the information below.

Part 1: List All Secured Claims

2. List all secured claims. If a creditor has more than one secured claim, list the creditor separately for each claim. If more than one creditor has a particular claim, list the other creditors in Part 2. As much as possible, list the claims in alphabetical order according to the creditor's name.

2.1	Creditor's Name	Describe the property that secures the claim:	Column A	Column B	Column C
			Amount of claim Do not deduct the value of collateral.	Value of collateral that supports this claim	Unsecured portion If any
	Palmas del Mar Homeowners Assoc Inc	PALMAS PLANTATION 12 EAGLE ST, HUMACAO, PR 00791 Debtor owns a residential property is located at Palmas Plantation 12 Eagle St, Humacao Puerto Rico; this property consists of: 3 bedrooms, 2 bathrooms, living & dining room and Kitchen.	\$3,070.09	\$285,000.00	\$3,070.09

**PO Box 9027
Humacao, PR 00791**

Number, Street, City, State & Zip Code

Who owes the debt? Check one.

- Debtor 1 only
- Debtor 2 only
- Debtor 1 and Debtor 2 only
- At least one of the debtors and another
- Check if this claim relates to a community debt

As of the date you file, the claim is: Check all that apply.

- Contingent
- Unliquidated
- Disputed

Nature of lien. Check all that apply.

- An agreement you made (such as mortgage or secured car loan)
- Statutory lien (such as tax lien, mechanic's lien)
- Judgment lien from a lawsuit
- Other (including a right to offset) _____

Date debt was incurred _____

Last 4 digits of account number **0394**

Debtor 1 JOSE MIGUEL CARDONA ALONZO First Name Middle Name Last Name	Case number (if known)	3:18-bk-6028		
2.2 ShellPoint Mortgage Servicing Creditor's Name		Describe the property that secures the claim: Tiffany Cond Apart 504, Carolina, PR 00979 Debtor owns a real property, this is an apartment located at Tiffany Condominium Apart 504, Carolina Puerto Rico; this property consists of: 2 bedrooms, 2 bathrooms, living & dining room, kitchen;	\$438,000.00	\$305,000.00
PO Box 10826 Greenville, SC 29603-0826 Number, Street, City, State & Zip Code		As of the date you file, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed	\$133,000.00	
Who owes the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim relates to a community debt		Nature of lien. Check all that apply. <input type="checkbox"/> An agreement you made (such as mortgage or secured car loan) <input type="checkbox"/> Statutory lien (such as tax lien, mechanic's lien) <input type="checkbox"/> Judgment lien from a lawsuit <input type="checkbox"/> Other (including a right to offset) _____		
Date debt was incurred _____		Last 4 digits of account number 6698		
2.3 Sps Creditor's Name		Describe the property that secures the claim: PALMAS PLANTATION 12 EAGLE ST, HUMACAO, PR 00791 Debtor owns a residential property is located at Palmas Plantation 12 Eagle St, Humacao Puerto Rico; this property consists of: 3 bedrooms, 2 bathrooms, living & dining room and Kitchen.	\$555,949.00	\$285,000.00
PO Box 65250 Salt Lake City, UT 84165-0250 Number, Street, City, State & Zip Code		As of the date you file, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed	\$270,949.00	
Who owes the debt? Check one. <input type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input checked="" type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim relates to a community debt		Nature of lien. Check all that apply. <input type="checkbox"/> An agreement you made (such as mortgage or secured car loan) <input type="checkbox"/> Statutory lien (such as tax lien, mechanic's lien) <input type="checkbox"/> Judgment lien from a lawsuit <input type="checkbox"/> Other (including a right to offset) _____		
Date debt was incurred 2003-08-18		Last 4 digits of account number 3396		

Add the dollar value of your entries in Column A on this page. Write that number here:
 If this is the last page of your form, add the dollar value totals from all pages.
 Write that number here:

\$997,019.09
\$997,019.09

Part 2: List Others to Be Notified for a Debt That You Already Listed

Use this page only if you have others to be notified about your bankruptcy for a debt that you already listed in Part 1. For example, if a collection agency is trying to collect from you for a debt you owe to someone else, list the creditor in Part 1, and then list the collection agency here. Similarly, if you have more than one creditor for any of the debts that you listed in Part 1, list the additional creditors here. If you do not have additional persons to be notified for any debts in Part 1, do not fill out or submit this page.

Debtor 1	JOSE MIGUEL CARDONA ALONZO		Case number (if known)	<u>3:18-bk-6028</u>
	First Name	Middle Name	Last Name	
<input type="checkbox"/>	Name, Number, Street, City, State & Zip Code Gonzalez & Morales Law Offices LLC Lcdo Jose Rafael Gonzalez Rivera PO Box 10242 Humacao, PR 00792			On which line in Part 1 did you enter the creditor? <u>2.1</u>
<input type="checkbox"/>	Name, Number, Street, City, State & Zip Code Martinez & Torres Law Offices PSC PO Box 192938 San Juan, PR 00919-3409			Last 4 digits of account number <u>0394</u>
<input type="checkbox"/>	Name, Number, Street, City, State & Zip Code MTGLQ Investors LP 200 West St New York, NY 10282-2102			On which line in Part 1 did you enter the creditor? <u>2.2</u>
				Last 4 digits of account number <u>6698</u>

Fill in this information to identify your case:		
Debtor 1	JOSE MIGUEL CARDONA ALONZO	
	First Name	Middle Name
Debtor 2 (Spouse if, filing)	Last Name	
United States Bankruptcy Court for the:	DISTRICT OF PUERTO RICO, SAN JUAN DIVISION	
Case number (if known)	<u>3:18-bk-6028</u>	

Check if this is an amended filing

Official Form 106Dec

Declaration About an Individual Debtor's Schedules

12/15

If two married people are filing together, both are equally responsible for supplying correct information.

You must file this form whenever you file bankruptcy schedules or amended schedules. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$250,000, or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Sign Below

Did you pay or agree to pay someone who is NOT an attorney to help you fill out bankruptcy forms?

No

Yes. Name of person _____

Attach Bankruptcy Petition Preparer's Notice, Declaration, and Signature (Official Form 119)

Under penalty of perjury, I declare that I have read the summary and schedules filed with this declaration and that they are true and correct.

X /s/ JOSE MIGUEL CARDONA ALONZO
JOSE MIGUEL CARDONA ALONZO
Signature of Debtor 1

X

Signature of Debtor 2

Date October 15, 2020

Date _____

Label Matrix for local noticing

0104-3

Case 18-06028-MCF13

District of Puerto Rico

Old San Juan

Thu Oct 15 13:58:37 AST 2020

CRIM

PO BOX 195387

SAN JUAN, PR 00919-5387

US Bankruptcy Court District of P.R.

Jose V Toledo Fed Bldg & US Courthouse

300 Recinto Sur Street, Room 109

San Juan, PR 00901-1964

BANCO POPULAR DE PUERTO RICO

BANKRUPTCY DEPARTMENT

PO BOX 366818

SAN JUAN PR 00936-6818

Condominio Tiffany

4939 Isla Verde Ave Ste 1003

Carolina, PR 00979-5474

DEPARTMENT OF TREASURY

BANKRUPTCY SECTION 424 B

PO BOX 9024140

SAN JUAN, PR 00902-4140

DLJ MORTGAGE CAPITAL INC.

P.O. Box 65250

Salt Lake City, UT 84165-0250

Departamento de Hacienda

Bankruptcy Section

235 Ave Arterial Hostos Ste 1504

San Juan, PR 00918-1451

Departamento de Hacienda

PO Box 9024140

San Juan, PR 00902-4140

Florida Blue

4800 Deerwood Campus Pkwy

Jacksonville, FL 32246-6498

(p) INTERNAL REVENUE SERVICE

CENTRALIZED INSOLVENCY OPERATIONS

PO BOX 7346

PHILADELPHIA PA 19101-7346

J Jaramillo Insurance

PO Box 195357

San Juan, PR 00919-5357

Lcdo Jose A Soto Verges

PO Box 211

Mayaguez, PR 00681-0211

MTGLQ Investors LP

200 West St

New York, NY 10282-2102

Martinez & Torres Law Offices PSC

PO Box 192938

San Juan, PR 00919-3409

ShellPoint Mortgage Servicing

PO Box 10826

Greenville, SC 29603-0826

Sps

PO Box 65250

Salt Lake City, UT 84165-0250

Virginia Rodriguez Marquez

316 Los Caminos St

Saint Augustine, FL 32095-7411

JOSE MIGUEL CARDONA ALONZO

URB QUINTAS DE CUPEY

B11 CALLE 16

SAN JUAN, PR 00926-6209

JOSE RAMON CARRION MORALES

PO BOX 9023884

SAN JUAN, PR 00902-3884

MONSITA LECAROZ ARIBAS

OFFICE OF THE US TRUSTEE (UST)

OCHOA BUILDING

500 TANCA STREET SUITE 301

SAN JUAN, PR 00901

ROBERTO FIGUEROA CARRASQUILLO

PO BOX 186

CAGUAS, PR 00726-0186

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Internal Revenue Service

PO Box 21126

Philadelphia, PA 19114-0326

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) CSMC 2019-RPL4 TRUST

End of Label Matrix	
Mailable recipients	21
Bypassed recipients	1
Total	22